

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

IAN FREEMAN, ET AL

No. 1:21-cr-00041-JL

**ASSENTED-TO MOTION TO CORRECT ORDER SETTING CONDITIONS OF  
RELEASE**

The government requests that the Court expeditiously correct the docket to reflect the conditions of release that the Court imposed at the recent hearing. The defendant has engaged in conduct that would be in violation of the conditions that the Court intended to apply.

The defendant recently moved to amend his conditions of release to request that his electronic monitoring device be removed. He did not request that any other conditions be changed. On June 28, 2022, the Court held a hearing on the motion, during which the only condition discussed was the electronic monitoring device. At the conclusion of the hearing, the Court determined that it would remove the electronic monitoring device and fashion a new condition requiring the defendant to check in with the probation officer periodically. The Court did not discuss changing any other conditions and the parties did not request any other changes. It was clear that the Court did not intend to change any other conditions.

On or about July 5, 2022, the Court filed an order setting conditions of release. The order was clearly filed erroneously as only three of five pages appeared on the docket (page two and four were missing). In addition, various of the previous conditions agreed to by the parties were not included in the order.

The defendant then knowingly engaged in conduct that would have violated his conditions as the Court intended to impose them and told others not to speak publicly about those

communications. Of particular import, the prohibitions against communications with certain co-defendants and witnesses and against trading in virtual currency were not included in the published order.

The government has attached a corrected OSCOR and requests that the Court impose it expeditiously to ensure the defendant's compliance. The defendant's counsel assents to this motion.

Respectfully submitted,

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Dated: July 12, 2022

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